

JULION NEAL MCGREW,
Plaintiff,
v.
FOUR TOWER TRANSPORTATION,
INC. and BUNDI B. BRONSON,
Defendants.

)
)
) **No.**
)
) **JUDGE _____**
) **MAGISTRATE JUDGE _____**
)
) **JURY DEMAND**
)
)

Pursuant to 28 U.S.C. § 1332, 1441, and 1446, Defendants, Four Tower Transportation, Inc. and Bundi B. Bronson, by counsel, files this Notice of Removal of this action from the Circuit County Court in Robertson County, Tennessee, where it is now pending, to the United States District Court for the Middle District of Tennessee based upon diversity of citizenship and an amount in controversy exceeding \$75,000.00. The grounds for removal are as follows.

1. This action was commenced on or about March 4, 2019 by Plaintiff's filing of the Complaint in the Robertson County Circuit Court in Davidson County, Tennessee, Case No. 74CC1-2019-CV-74 (the "Complaint"). True and accurate copies of the pleadings filed in this action and summons and alias summonses are attached as Exhibit A.

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3. The Complaint contains allegations of negligence and negligence per se. Defendants would state that the amount in controversy exceeds \$75,000.00, as the Plaintiffs have demanded over \$235,000.00 in correspondence.

4. The Plaintiff is a citizen and a resident of Morgantown, Butler County, Kentucky.

5. The Defendant, Four Towers Transportation is a corporation organized under the laws of Florida, with its principal place of business in Miami, Florida. Mr. Bundi is a resident of Hollywood, Florida..

6. The United States District Court for the Middle District of Tennessee has original jurisdiction over this action pursuant to 28 U.S.C. § 1332 as there is complete diversity of the parties, and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs.

7. A copy of this Notice of Removal is being served by U.S. mail on counsel for Plaintiffs, and a Notice of Filing of Notice of Removal is being filed with the Robertson County Circuit Court in Robertson County, Tennessee, in accordance with 28 U.S.C. § 1446(d). (Copies of those notices are attached as Exhibit B.) The necessary filing fees have been paid simultaneously with the filing of the Notice of Removal.

8. Defendants, Four Tower Transportation, Inc. and Bundi B. Bronson demand a jury to try this case.

WHEREFORE, Defendants, Four Tower Transportation, Inc. and Bundi B. Bronson pray this Court consider the Notice of Removal as provided by law governing removal of cases to this Court and that this Court enter the appropriate orders to effect the removal of this case from the Robertson County Circuit Court in Robertson County, Tennessee to this Court.

Respectfully submitted,

LEWIS THOMASON

By: /s/ Christen C. Blackburn

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Attorneys for Defendants, Four Tower
Transportation, Inc. and Bundi B. Bronson

CERTIFICATE OF SERVICE

I hereby certify that on this the 8th day of April, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Flora Templeton Stuart
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/s/ Christen C. Blackburn

Christen C. Blackburn